

John P. Kristensen (SBN 224132)
KRISTENSEN LAW GROUP
120 Santa Barbara St., Suite C9
Santa Barbara, California 93101
Telephone: (617) 913-0363
john@kristensen.law

Attorney for Plaintiffs

**THE UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION**

ANDREA KEPLER, and MELISSA GONZALEZ, an individual, and individually and on behalf of all others similarly situated,

) Case No.: 2:23-cv-1985-MCS-MAA
)
)
) COLLECTIVE ACTION
)
)
) PLAINTIFFS ANDREA
) KEPLER'S & MELISSA
) GONZALEZ'S NOTICE OF
) LODGING OF PROPOSED
) JUDGMENT AFTER
) ACCEPTANCE OF
) DEFENDANTS FED. R. CIV. P.
) 68 OFFER OF JUDGMENT
)
)
)
Complaint Filed: March 16, 2023
)
)
)
)

PRISMA ENTERTAINMENT, LLC,
dba PLAN B GENTLEMEN'S
CLUB, a California Corporation;
FRANK GRUNDEL, an individual;
DOE MANAGERS 1- 3; and DOES
4-10, inclusive,

Defendants.

COMES NOW plaintiffs Andrea Kepler and Melissa Gonzalez (“Plaintiff”), by and through undersigned counsel, and respectfully submits this Notice of Lodging Proposed Judgment pursuant to the Notice of Acceptance

**NOTICE OF PLAINTIFFS ANDREA KEPLER'S & MELISSA GONZALEZ'S LODGING OF
PROPOSED JUDGMENT**

1 filed on February 12, 2024. *See* Dkt. 31.

2
3 Dated: February 18, 2024

KRISTENSEN LAW GROUP

4
5 /s/ John P. Kristensen
John P. Kristensen
6 *Attorneys for Plaintiffs*



KRISTENSEN
LAW GROUP



1
2 **CERTIFICATE OF SERVICE**

3 I certify that on Sunday, February 18, 2024 a true and correct copy of the
4 attached **NOTICE OF PLAINTIFFS ANDREA KEPLER'S & MELISSA**
5 **GONZALEZ'S LODGING OF PROPOSED JUDGMENT AFTER**
6 **ACCEPTANCE OF DEFENDANTS FED. R. CIV. P. 68 OFFER OF**
7 **JUDGMENT** was served via CM/ECF upon the following parties pursuant to
Rule 5 of the Federal Rules of Civil Procedure:

8 Doug P. Roy
9 Lilian Loh
10 **CYPRESS LLP**
11 11111 Santa Monica Blvd., Suite 500
12 Los Angeles, CA 90025
13 Phone: 424-901-0148
14 Facsimile: 424-750-5100
15 *doug@cypressllp.com*
16 *lilian@cypressllp.com*

17 *Counsel for Defendants*

18 */s/ John P. Kristensen*

19 John P. Kristensen